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capacity as Trustee of the Circuit City Stores,
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page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Siegel v. Hitachi, Ltd., No. 11-cv-05502;
Siegel v. Technicolor SA, No. 13-cv-05261;

**STIPULATION AND ~~PROPOSED~~
ORDER DISMISSING WITH
PREJUDICE PLAINTIFF'S
CLAIMS UNDER STATE LAW**

The Honorable Samuel Conti

Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust (the "Circuit City Trust"), and defendants Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi America, Ltd., Hitachi Asia, Ltd., Hitachi Electronic Devices (USA), Inc., Shenzhen SEG Hitachi Color Display Devices, Ltd., LG Electronics, Inc., LG Electronics USA, Inc., LG Electronics Taiwan Taipei Co., Ltd., Panasonic Corporation, Panasonic Corporation of North America, MT Picture Display Co., Ltd., Beijing Matsushita Color CRT Co., Ltd., Koninklijke Philips Electronics N.V., Philips Electronics North

1 America Corporation, Philips Electronics Industries (Taiwan), Ltd., Philips da Amazonia
2 Industria Electronica Ltda., Samsung SDI Co., Ltd., Samsung SDI America, Inc., Samsung SDI
3 Mexico S.A. de C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., Tianjin
4 Samsung SDI Co., Ltd., Samsung SDI (Malaysia) Sdn. Bhd., Toshiba Corporation, Toshiba
5 America, Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic
6 Components, Inc., Toshiba America Information Systems, Inc., Technicolor SA, Technicolor
7 USA, Inc., Technologies Displays Americas LLC, Mitsubishi Electric Corporation, Mitsubishi
8 Electric Visual Solutions America, Inc., and Mitsubishi Electric & Electronics USA, Inc., being
9 all the defendants in this case (collectively “Defendants”), state as follows:
10

11 On October 17, 2013, the Circuit City Trust filed its First Amended Complaint (“FAC”) in
12 individual case number 11-cv-05502 (MDL Master Dkt. No. 2016). On November 12, 2013, the
13 Circuit City Trust filed its Complaint in individual case number 13-cv-05261 (the
14 “Thomson/Mitsubishi/TDA Complaint”) (Ind. Case Dkt. No. 1). The FAC and the
15 Thomson/Mitsubishi/TDA Complaints are the “Complaints.” In the Complaints, the Circuit City
16 Trust asserts claims for relief against Defendants under the Sherman Act, the California
17 Cartwright Act, California Consumer Protection and Unfair Competition Laws, and the Illinois
18 Antitrust Act.
19

20 The Circuit City Trust now desires to dismiss with prejudice its claims against Defendants
21 under the California Cartwright Act, California Consumer Protection and Unfair Competition
22 Laws, and the Illinois Antitrust Act. The Circuit City Trust is not dismissing, and will continue to
23 prosecute, its claims against Defendants under the Sherman Act.
24

25 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE that the claims of the
26 Circuit City Trust asserted against Defendants in these cases under the California Cartwright Act,
27 California Consumer Protection and Unfair Competition Laws, and the Illinois Antitrust Act are
28

1 dismissed with prejudice. This dismissal does not apply to the claims of the Circuit City Trust
2 asserted against Defendants in these cases under the Sherman Act.

3
4 Dated: October 13, 2014

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21 *his capacity as Trustee of the Circuit City*
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1 Pursuant to General Order No. 45, § X-B, the filer asserts that concurrence in the filing of
2 this document has been obtained from each of the above signatories.

3
4 /s/ Kenneth S. Marks

5 Kenneth S. Marks

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7
8 **IT IS SO ORDERED.**

9
10 Dated: October 22, 2014

